

# Substance Release Reporting Program Contractor Responsibilities

## Overview

Substance release reporting is required under the Environmental Protection and Enhancement Act (EPEA), the Transportation of Dangerous Goods Act (TDGA), the Fisheries Act, and the Canadian Environmental Protection Act (CEPA). The City of Calgary (The City) and any party doing work on behalf of The City (i.e. contractors and consultants) has the obligation to report the release or discovery of any deleterious (i.e. harmful) substance that has or may cause a negative environmental effect.

## Purpose

This document outlines the reporting requirements for the City of Calgary and applicable legislation.

## Applicable to

Any contractor or consultant performing work on behalf of The City of Calgary.

## Definitions

AEPA - Alberta Environment and Protected Areas

Applicable Legislation - provincial reporting requirements under EPEA and TDGA and federal reporting requirements under the Fisheries Act and CEPA.

City or The City - The City of Calgary, a municipal corporation of the Province of Alberta.

Contamination Discovery - the unexpected indication of possible contamination during ground disturbance activities. Indications of possible contamination include but are not limited to:

- Existence or discovery of drums and containers
- Stained or discolored earth in contrast with adjoining soil
- Fill material containing debris
- Trash or industrial waste debris
- Suspect odors which emanate when the earth is disturbed
- Oily residue intermixed with earth
- Sheen or discoloration on groundwater
- Cinders or other combustion byproducts like ash

Contractor - Entity that contracts or sub-contracts with The City of Calgary on predetermined terms to provide labour and materials and to be responsible for the performance of work.

Project Designate - City of Calgary contact for a specific project or other contracted work (e.g. project manager, contract manager, site supervisor, foreman, environmental specialist)

Release – The action to spill, discharge, dispose of, spray, inject, inoculate, abandon, deposit, leak, seep, pour, emit, empty, throw, dump, place or exhaust.

Reportable Release - any release or discovery of a substance caused or discovered, both on City-owned and privately-owned property that exceeds established thresholds and/or has caused, is causing or may cause an adverse effect on the environment.

Substance - Any matter that is capable of becoming dispersed or transformed in the environment and/or any sound, vibration, heat, radiation or other form of energy. Substances may include but are not limited to vapours, fumes and gases, liquid chemicals, or sediments entering water bodies and water infrastructure

## Reporting Contractor Releases

Any release as a result of contracted work being conducted on behalf of The City of Calgary shall be reported. The Contractor must:

1. Maintain a list of key contacts and phone numbers for reporting spills and other incidents and ensure the contact list is posted in a visible location at the worksite.
2. Take immediate action to protect their safety and the safety of others. If possible/safe to do so, stop and/or contain the release.

Certain types of spills must immediately be reported to Alberta Environment and Protected Areas (AEPA) hotline at 1-800-222-6514). ([A guide to release reporting : Alberta Environmental Protection and Enhancement Act - Open Government](#))

3. Record the date and time of the call, and report reference number.

A report must made to AEPA when the spill or chemical:

- Is released to a wetland, body of water, storm water system or storm pond
  - Is released to the air, or causes a nuisance odour that could affect the public
  - It is released to a permeable surface, like soil or gravel, except when less than 5 litres of a petroleum product is spilled and cleaned up immediately (e.g. using a spill kit)
  - Is released to an outdoor paved or sealed surface and is greater than 30 litres
  - Is a polychlorinated biphenyl (PCB), explosive, or nuclear substance
  - Substance release beyond allowable limits in an operating permit or approval (if one is applicable for the project), or
  - May cause an adverse effect on the environment, property or human health or safety.
- When in doubt, spills or releases should be reported to the AEPA hotline.

4. Immediately report all substance releases to The City's project designate, **as well as completing The City's internal release report by calling 3-1-1**, if this responsibility has been delegated by the project designate.

## Preparing and Responding to Substance Releases

Contractors should establish emergency spill response plans, provide spill containment kits and disposal processes for potential situations. In the event, a spill or substance release is uncontrollable or beyond your ability to clean up, call 911 immediately and follow the operator's instructions.

## Reporting Contamination Discovery

The Contractor must immediately notify The City of Calgary Fire Department (9-1-1 for emergencies or (403) 264-1022 for non-emergencies) and The City's project designate of any unexpected contamination encountered during the work. The Contractor must also contact AEPA immediately by calling 1-800-222-6514 and record the date and time of the call, as well as the AEPA operator name and report reference number. AEPA should be informed that this is a contamination discovery that is being reported under section 110(3) of the Environmental Protection and Enhancement Act.